

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DARYL FRANK SWARTZ and : CHAPTER 13
ELAINE RENEE SWARTZ :
Debtor(s) :
: CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
: vs. :
: DARYL FRANK SWARTZ and :
ELAINE RENEE SWARTZ :
Respondent(s) : CASE NO. 1-19-bk-01790

TRUSTEE'S OBJECTION TO FIFTH AMENDED CHAPTER 13 PLAN

AND NOW, this 30th day of March, 2021, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s)

1. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:

- a. Current listing agreement for 3329 Orrstown Road, Orrstown, PA.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 30th day of March, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Lawrence Young, Esquire
135 North George Street
York, PA 17401

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee